

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
CASE NO. 23-801010-CR-CANNON**

UNITED STATES OF AMERICA,

v.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

/

MOTION TO CONTINUE

Defendants Waltine Nauta and Carlos De Oliveira, by and through the undersigned counsel, and pursuant to Rule 7.6 of the Local Rules for the United States District Court for the Southern District of Florida hereby respectfully request the Court continue the Non-Evidentiary Hearing now set for April 19, 2024 at 10:00AM.

Earlier today, the Court set a Non-Evidentiary Hearing on Mr. De Oliveira's Motion to Dismiss, or in the Alternative for a Bill of Particulars (Feb. 22, 2024) (ECF No. 323); as well as Mr. Nauta's Motion for a Bill of Particulars (which is not currently docketed) and his Motion to Dismiss for Failure to State a Defense, for Vagueness, or in the Alternative, under the Rule of Lenity (also not currently docketed). Notice (April 8, 2024) (ECF No. 434). However, lead counsel for both Messrs. Nauta and De Oliveira each have long-scheduled personal conflicts for which non-refundable payments have been made that render them unavailable to attend a hearing between April 13 and April 20 (counsel for Mr. Nauta) or between April 18 to April 23 (counsel for Mr. De Oliveira). Accordingly, defense counsel submit there is good cause to continue the April 19 Non-Evidentiary Hearing and respectfully request the Court continue the Non-

Evidentiary Hearing one week, until April 26, 2024, or a day that is otherwise convenient for the Court.

Defense counsel have conferred with counsel for the Special Counsel's Office, whom advise they, "do not oppose rescheduling the hearing in light of your message [explaining defense counsel's personal conflicts]," and further advise that counsel for the Special Counsel's Office is, "available anytime that suits the Court, including this week." Counsel for Messrs. Nauta and De Oliveira are also available this week, should the Court prefer to hold the hearing then.

Date: April 8, 2024

Respectfully submitted,

s/ Stanley E. Woodward, Jr.
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Counsel for Defendant Waltine Nauta

Counsel for Defendant Carlos De Oliveira

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 88.9 of the Local Rules for the United States District Court of the Southern District of Florida, defense counsel has conferred with counsel for the Special Counsel's Office whom advise that they, "do not oppose" the relief sought in the instant motion.

Respectfully submitted,

s/ Sasha Dadan
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Counsel for Defendant Waltine Nauta

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2024, I electronically submitted the foregoing via electronic mail, to counsel of record.

s/ Sasha Dadan